

NON-ATTAINMENT PERMIT
NEW SOURCE PERFORMANCE STANDARDS PERMIT
STATIONARY SOURCE PERMIT TO MODIFY AND OPERATE

This permit supersedes your permit dated September 12, 2003.

In compliance with the Federal Clean Air Act and the Commonwealth of Virginia Regulations for the Control and Abatement of Air Pollution,

Quebecor World San Jose, Inc.
7400 Impala Drive
Richmond, Virginia 23228
Registration No. 50880
County Plant ID No. 087-0130

is authorized to modify and operate

a publication rotogravure printing facility

located at

7400 Impala Drive
Henrico County, Virginia

in accordance with the Conditions of this permit.

Approved on DRAFT.

Deputy Regional Director
Department of Environmental Quality

Permit consists of 18 pages.

Permit Conditions 1 to 52.

INTRODUCTION

This permit approval is based on the permit application dated February 28, 1997, January 23, 2001, and December 3, 2002, including amendment sheets dated June 24, 1997, February 13, 1998, January 27, 1999, March 26, 1999, November 13, 2000, May 15, 2001, May 21, 2001, February 27, 2002, November 15, 2002, December 3, 2002, March 3, 2003, March 19, 2003, September 10, 2003, April 24, 2006 and June 23, 2006. Any changes in the permit application specifications or any existing facilities which alter the impact of the facility on air quality may require a permit. Failure to obtain such a permit prior to construction may result in enforcement action.

Words or terms used in this permit shall have meanings as provided in 9 VAC 5-10-20 of the State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution. The regulatory reference or authority for each condition is listed in parentheses () after each condition.

Annual requirements to fulfill legal obligations to maintain current stationary source emissions data will necessitate a prompt response by the permittee to requests by the DEQ or the Board for information to include, as appropriate: process and production data; changes in control equipment; and operating schedules. Such requests for information from the DEQ will either be in writing or by personal contact.

The availability of information submitted to the DEQ or the Board will be governed by applicable provisions of the Freedom of Information Act, §§ 2.2-3700 through 2.2-3714 of the Code of Virginia, § 10.1-1314 (addressing information provided to the Board) of the Code of Virginia, and 9 VAC 5-170-60 of the State Air Pollution Control Board Regulations. Information provided to federal officials is subject to appropriate federal law and regulations governing confidentiality of such information.

PROCESS REQUIREMENTS

1. Equipment previously permitted at the publication rotogravure printing facility consists of:
 - one Renzmann Type 136-35 press cylinder cleaning tank, rated at 6 cylinders per hour (not NSPS);
 - two Goss publication rotogravure printing presses consisting of 8 printing units each, a web width of 75 inches and rated at 1700 feet per minute, designated as Presses No. 740 (NSPS Subpart QQ, MACT KK) and No. 741 (NSPS Subpart QQ, MACT KK) with a maximum rated capacity of 831.4 and 915.9 lbs of VOC as applied per hour, respectively;

- one Motter publication rotogravure printing press consisting of 10 printing units, a web width of 96 inches and rated at 2000 feet per minute, designated as Press No. 742 (NSPS Subpart QQ, MACT KK) with a maximum rated capacity of 1039.6 lbs of VOC as applied per hour;
- one Goss publication rotogravure printing press consisting of 8 printing units, a web width of 75 inches and rated at 1700 feet per minute, designated as Press No. 743 (NSPS Subpart QQ, MACT KK) with a maximum rated capacity of 915.9 lbs of VOC as applied per hour;
- one Albert Frankenthal publication rotogravure printing press consisting of 8 printing units, a web width of 94 inches and rated at 3000 feet per minute, designated as Press No. 744 (NSPS Subpart QQ, MACT KK) with a maximum rated capacity of 1406.0 lbs of VOC as applied per hour;
- one Albert Frankenthal publication rotogravure printing press consisting of 8 printing units, a web width of 3.18 meters and rated at 3000 feet per minute, designated as Press No. 745 (NSPS Subpart QQ, MACT KK) with a maximum rated capacity of 1952.0 lbs of VOC as applied per hour;
- one Cleaver-Brooks 700HP natural gas/distillate oil-fired boilers rated at 29.4 MMBtu/hr heat input, designated as Boiler 1 (not NSPS);
- one Cleaver-Brooks 800HP natural gas/distillate oil-fired boilers rated at 33.48 MMBtu/hr heat input, designated as Boiler 2 (not NSPS);
- one Johnson PFTA 800 HP natural gas/distillate oil-fired boiler rated at 33.48 MMBtu/hr heat input, designated as Boiler No. 3 (NSPS Subpart Dc);
- Solvent Recovery System A consisting of partial enclosure and carbon adsorption systems number 1 and 2 controlling emissions from presses 740, 741, 742, 743, 744 and Renzmann cylinder wash tank;
- Solvent Recovery System B consisting of permanent total enclosure and carbon adsorption system 3 controlling emissions from press 745;
- Waste paper handling system consisting of Unit P017 (Cyclone and Baghouse A rated at 8,000 cfm), Unit P018 (Cyclone and Baghouse B rated at 12,000 cfm), and Unit P019 (Cyclone and Baghouse C rated at 18,000 cfm); and
- Paster glue process

(9 VAC 5-50-30)

2. **Emission Controls;** Volatile organic compound (VOC) emissions from Presses No. 740, 741, 742, 743, 744 and the Renzmann Cylinder Wash shall be controlled by a carbon bed adsorption system (Solvent Recovery A) with an overall recovery efficiency of 91 percent. Compliance with this condition shall be demonstrated through a VOC mass balance equation. The solvent recovery system shall be provided with adequate access for inspection.
(9 VAC 5-80-1180 and 9 VAC 5-50-260)
3. **Emission Controls;** Volatile organic compound (VOC) emissions from Press No. 745 shall be controlled by a 100 percent efficient permanent total enclosure capture system and a dedicated carbon bed adsorption system (Solvent Recovery System B: C003) having an overall control efficiency of 97.7 percent. The printing press, permanent total enclosure, and carbon bed adsorption system shall be provided with adequate access for inspection.
(9 VAC 5-80-1180 and 9 VAC 5-50-260)
4. **Emission Controls;** Volatile Organic Compound (VOC) emissions from the operation of each of the rotogravure presses shall not exceed 16 percent of the total mass of VOC solvent and water used at that press during any one performance averaging period (ref. 40 CFR 60.432). For continuing compliance purposes, the performance-averaging period is one calendar month.
(9 VAC 5-170-160 and 9 VAC 5-50-410)
5. **Emission Controls;** The permanent total enclosure for Press No. 745 shall meet the following criteria:
 - a. Any natural draft openings shall be at least 4 equivalent opening diameters from each VOC emitting point;
 - b. The total area of all natural draft openings shall not exceed 5 percent of the surface area of the enclosure's four walls, floor and ceiling;
 - c. The average facial velocity of air through the natural draft openings shall be at least 200 feet per minute (0.013 mm Hg or 0.007 in H₂O if measured by a differential pressure gauge) and the direction of air flow shall be into the enclosure.
 - d. All access doors and windows shall be closed during routine operation of the press.
 - e. All of the exhaust gases from the enclosure shall be directed to the carbon bed

adsorption system.

(9 VAC 5-80-1180)

6. **Emission Controls;** Particulate and PM10 emissions from the operation of the waste paper handling system shall be controlled by proper operation and maintenance of the waste paper handling system including the cyclone and baghouse units P017, P018, and P019. The cyclones shall be provided with adequate access for inspection. An annual inspection shall be conducted on the cyclone for the purpose of identifying leaks, cracks, or other structural problems. The baghouses shall meet a control efficiency of 90%.
(9 VAC 5-80-1180 and 9 VAC 5-50-260)

OPERATING/EMISSION LIMITATIONS

7. **Throughput;** The Renzmann cylinder cleaning tank shall clean no more than 10,000 cylinders per year, calculated monthly as the sum of the number of cylinders cleaned over the previous consecutive 12 months.
(9 VAC 5-80-1180)
8. **Throughput;** The throughput of VOC to the Presses No. 740, 741, 742, and 743 shall not exceed 10,585.5 tons per year, calculated monthly as the sum of the VOC throughput over the previous consecutive 12 months.
(9 VAC 5-80-1180)
9. **Throughput;** The throughput of VOC to Press No. 744 shall not exceed 4115.1 tons per year, calculated monthly as the sum of the VOC throughput over the previous consecutive 12 months.
(9 VAC 5-80-1180)
10. **Throughput;** The throughput of VOC to Press No. 745 shall not exceed 46,848 pounds per day. The throughput of VOC to Press No. 745 shall not exceed 4500 tons per year, calculated monthly as the sum of the VOC throughput over the previous consecutive 12 months.
(9 VAC 5-80-1180)
11. **Throughput;** The throughput of VOC from paster glue to Press Nos. 740, 741, 742, 743, 744, and 745 shall not exceed 1.5 tons per year, calculated monthly as the sum of the previous consecutive 12 months.
(9 VAC 5-80-1180)
12. **Fuel;** The approved fuels for the boilers are natural gas and distillate oil. Distillate oil is defined as fuel oil that meets the specifications for fuel oil numbers 1 or 2

under the American Society for Testing and Materials, ASTM D396-97 "Standard Specification for Fuel Oils". A change in the fuels may require a permit to modify and operate.

(9 VAC 5-80-1180)

13. **Fuel Throughput;** The boilers shall consume no more than a total of 409.3 million cubic feet of natural gas and a total of 680,000 gallons of distillate oil per year, calculated monthly as the sum of the gas or oil consumption over the previous consecutive 12 months.

(9 VAC 5-80-1180)

14. **Fuel;** The distillate oil and natural gas shall meet the specifications below:

DISTILLATE OIL which meets the ASTM [D396] specification for numbers 1 or 2 fuel oil:

Maximum sulfur content per shipment: 0.5%

NATURAL GAS:

Minimum heat content: 1000 Btu/cf HHV.

(9 VAC 5-80-1180)

15. **Fuel Certification;** The permittee shall obtain a certification from the fuel supplier with each shipment of distillate oil. Each fuel supplier certification shall include the following:

- a. The name of the fuel supplier,
- b. The date on which the oil was received,
- c. The volume of distillate oil delivered in the shipment,
- d. A statement that the distillate oil complies with the American Society for Testing and Materials specifications for fuel oil numbers 1 and 2, and
- e. The sulfur content of the oil.

(9 VAC 5-80-1180 and 9 VAC 5-50-410)

16. **Operating and Training Procedures;** Boiler emissions shall be controlled by proper operation and maintenance of combustion equipment. Boiler operators shall be trained in the proper operation of all such equipment. Training shall consist of a review and familiarization of the manufacturer's operating instructions, at minimum. The permittee shall maintain records of the required training including a statement of time, place and nature of training provided. The permittee shall have available

good written operating procedures and a maintenance schedule for the boiler. These procedures shall be based on the manufacturer's recommendations, at minimum. All records required by this condition shall be kept on site and made available for inspection by the DEQ.
(9 VAC 5-170-160)

17. **Emission Limits;** Volatile Organic Compound (VOC) emissions from the operation of the rotogravure presses as determined by mass balance calculation, actual press running hours, and VOC CEMS shall not exceed the limits specified below:

Press No.	<u>lbs/hr</u>	<u>lbs/day</u>	<u>tons/yr</u>
Press 740	77.5		226.8
Press 741	82.4		211.5
Press 742	93.6		273.7
Press 743	82.4		240.8
Press 744	126.5		370.4
Press 745	54.7	1311.7	126.0
Paster Gluing Process	0.4		1.5
Total Press VOC Emissions	517.5	1311.7	1450.5

These emissions are derived from the estimated overall emission contribution from operating limits. Exceedance of the operating limits shall be considered credible evidence of the exceedance of emission limits. Compliance with these emission limits may be determined as stated in Condition numbers 1, 2, 3, 4, 5, 8, 9, 10, and 11.
(9 VAC 5-50-260)

18. **Emission Limits;** Toxic pollutant emissions, as limited by permit Condition 17 for each press as VOC, shall not exceed the percentages (by weight) of each component of the solvent blend as listed below:

hexane	1.00%
benzene	0.01%
toluene	96.00%
ethyl benzene	2.00%
xylene	5.16%

(9 VAC 5-60-330)

19. **Hazardous Air Pollutants;** The permittee is limited to use of the following hazardous air pollutants (HAPs) in coatings, adhesives, inks, thinners, and cleaning solutions for the rotogravure printing process:

HAP	CAS Number
hexane	110-5-43
benzene	71-43-2
toluene	108-88-3
ethylbenzene	100-4-14
xylene	1330-20-7

- a. The permittee may use additional toxic compound or HAP in the rotogravure printing process under 9 VAC 5-60-300 without obtaining a new permit provided the following conditions are met:
- b. Notification shall be given to the Director, Piedmont Region. Such notification shall be made within fifteen (15) days after the use of additional toxic compounds or HAPs and shall include identification of the toxic compound or HAP, the date the toxic compound or HAP was first used, and the anticipated maximum throughput of that compound in lbs/hr and tons/yr. Additional details of the notification should be arranged with the Director, Piedmont Region.
- c. The permittee shall operate this facility in compliance with 9 VAC 5 Chapter 60, Article 5, for all toxic compounds or HAPs.
- d. If a permit is required, failure to obtain the permit prior to the change in process formulation or the use of any additional toxic compound or HAP may result in enforcement action.

(9 VAC 5-80-1180 and 9 VAC 5-60-240)

20. **Emission Limits;** Emissions from the operation of all three natural gas/distillate oil-fired boilers shall not exceed the limits specified below:

	Boiler Specific Hourly Emissions			Combined Hourly and Annual Emissions from B-1, B-2, and B-3	
	B-1	B-2	B-3	Hourly	Annual
TSP	0.9 lbs/hr	0.5 lbs/hr	0.5 lbs/hr	1.8 lbs/hr	2.2 tpy
PM ₁₀	0.4 lbs/hr	0.3 lbs/hr	0.3 lbs/hr	0.9 lbs/hr	1.9 tpy
SO ₂	30.3 lbs/hr	17.2 lbs/hr	17.2 lbs/hr	64.7 lbs/hr	24.3 tpy
NO _x	8.5 lbs/hr	4.9 lbs/hr	4.9 lbs/hr	18.2 lbs/hr	27.3 tpy
CO	2.5 lbs/hr	2.8 lbs/hr	2.8 lbs/hr	8.1 lbs/hr	18.9 tpy
VOC	0.2 lbs/hr	0.2 lbs/hr	0.2 lbs/hr	0.5 lbs/hr	1.2 tpy

These emissions are derived from the estimated overall emission contribution from operating limits. Exceedance of the operating limits shall be considered credible evidence of the exceedance of emission limits. Compliance with these emission

limits may be determined as stated in Condition numbers 1, 12, 13, 14, 15, and 25.
(9 VAC 5-50-260)

21. **Emission Limits**; Volatile Organic Compound (VOC) emissions from the operation of the Renzmann cylinder cleaning tank shall not exceed the limits specified below:

VOC	13.4 lbs/hr	11.2 tons/yr
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These emissions are derived from the estimated overall emission contribution from operating limits. Exceedance of the operating limits shall be considered credible evidence of the exceedance of emission limits. Compliance with these emission limits may be determined as stated in Condition numbers 1 and 7.
(9 VAC 5-50-260)

22. **Emission Limits**; Emissions vented outside of the building from the waste paper handling system shall not exceed the limits specified below. Annual emissions shall be calculated as the sum of each consecutive 12 month period:

Total Suspended Particulates	0.01 grains/dscf	0.3 lb/hr	1.4 tons/yr
PM ₁₀	0.01 grains/dscf	0.3 lb/hr	1.4 tons/yr

These emissions are derived from the estimated overall emission contribution from operating limits. Exceedance of the operating limits shall be considered credible evidence of the exceedance of emission limits. Compliance with these emission limits may be determined as stated in Condition numbers 6, 26, 35, and 39.
(9 VAC 5-50-260)

23. **Plantwide Emission Limits**; Plant-wide emissions from the operation of the printing facility shall not exceed the limits specified below:

Total Suspended Particulates (including PM ₁₀)	2.1 lbs/hr	3.6 tons/yr
PM ₁₀	1.2 lbs/hr	3.3 tons/yr
Sulfur Dioxide	64.7 lbs/hr	24.3 tons/yr
Nitrogen Oxides (as NO ₂)	18.2 lbs/hr	27.3 tons/yr
Carbon Monoxide	8.1 lbs/hr	18.9 tons/yr
Volatile Organic Compounds	531.5 lbs/hr	1462.9 tons/yr

Toluene	388.2 lbs/hr	1259.5 tons/yr
Xylene	24.7 lbs/hr	67.7 tons/yr
Hexane	4.8 lbs/hr	13.1 tons/yr
Ethylbenzene	9.6 lbs/hr	26.2 tons/yr

These emissions are derived from the estimated overall emission contribution from operating limits. Exceedance of the operating limits shall be considered credible evidence of the exceedance of emission limits.
(9 VAC 5-50-260 and 9 VAC 5-60-320)

24. **Visible Emissions Limits**; Visible emissions from the carbon bed adsorption system dedicated to the Frankenthal press No. 745 shall not exceed 5 percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A).
(9 VAC 5-50-80 and 9 VAC 5-50-20)
25. **Visible Emissions Limits**; Visible emissions from the boiler stacks shall not exceed 10 percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 20 percent opacity. This condition applies at all times except during start-up, shutdown, or malfunction.
(9 VAC 5-50-80 and 9 VAC 5-50-20)
26. **Visible Emissions Limits**; Visible emissions from the waste paper handling system shall not exceed 5 percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A).
(9 VAC 5-50-80 and 9 VAC 5-50-20)
27. **NSPS Subpart Dc Requirements by Reference**; Except where this permit is more restrictive than the applicable requirement, the NSPS Subpart Dc equipment as described in Condition 1 shall be operated in compliance with the requirements of 40 CFR 60, Subpart Dc.
(9 VAC 5-50-400 and 9 VAC 5-50-410)
28. **NSPS Subpart QQ Requirements by Reference**; Except where this permit is more restrictive than the applicable requirement, the NSPS Subpart QQ equipment as described in Condition 1 shall be operated in compliance with the requirements of 40 CFR 60, Subpart QQ.
(9 VAC 5-50-400 and 9 VAC 5-50-410)
29. **MACT Subpart KK Requirements by Reference**; Except where this permit is more restrictive than the applicable requirement, the MACT Subpart KK equipment as

described in Condition 1 shall be operated in compliance with the requirements of 40 CFR 63, Subpart KK.
(9 VAC 5-60-120)

30. **MACT Subpart N Requirements by Reference;** Except where this permit is more restrictive than the applicable requirement, the MACT Subpart N equipment as described in Condition 1 shall be operated in compliance with the requirements of 40 CFR 63, Subpart N.
(9 VAC 5-60-120)

31. **Testing/Monitoring Ports;** The permitted facility shall be constructed so as to allow for emissions testing and monitoring upon reasonable notice at any time, using appropriate methods. Test ports shall be provided when requested or in accordance with the applicable performance specification reference 40 CFR Part 60, Appendix B.
(9 VAC 5-50-30 F)

CONTINUOUS EMISSIONS MONITORING

32. **CEMS for VOC;** The carbon bed adsorption system for Press No. 745 shall be equipped with continuous emission monitors which measure and record the concentration of volatile organic compounds and shall be equipped with a device which calculates and records a 24 hour average VOC removal efficiency and which demonstrates compliance daily with the VOC removal efficiency requirement of Condition 3. The continuous emissions monitors shall be located at the carbon bed adsorption system inlet plenum and exhaust stack and shall be maintained, located, and calibrated in accordance with approved procedures. A 30 day notification, prior to the demonstration of continuous monitoring system's performance, and subsequent notifications shall be submitted to the Director, Piedmont Regional Office.

(9 VAC 5-80-30 F and 9 VAC 5-40-5130)

33. **CEMS for VOC;** A continuous emission monitor shall be installed to measure and record the concentration of volatile organic compound emitted from the solvent recovery systems. It shall be maintained and calibrated in accordance with vendor recommendations.

(9 VAC 5-50-40 F)

34. **Monitoring Device;** The permanent total enclosure shall be equipped with devices to continuously measure and record differential pressure drop across the enclosure boundary or continuous measurement of the facial velocity of airflow into the enclosure to determine compliance with Condition 5.c . Each monitoring device shall be installed, maintained, calibrated and operated in accordance with approved

procedures which shall include, as a minimum, the manufacturer's written requirements or recommendations. Each monitoring device shall be provided with adequate access for inspection and shall be in operation when the Press 745 is operating.

(9 VAC 5-80-30 F and 9 VAC 5-20-121)

35. **Monitoring Device;** The baghouses at the waste paper handling system shall be each equipped with a device to continuously measure the differential pressure drop across the fabric filter. The devices shall be installed in an accessible location and shall be maintained by the permittee such that it is in proper working order at all times.

(9 VAC 5-50-260)

36. **Continuous Monitoring Systems and Measuring Devices;** All continuous monitoring systems and measuring devices shall be installed and operational prior to conducting initial performance tests. Performance evaluations of the continuous monitoring system must take place during the performance tests under 9 VAC 5-50-30 of the Regulations or within 30 days thereafter. Two copies of the performance evaluation report shall be submitted to the Director, Piedmont Regional Office within 45 days of said evaluation. Verification of operational status shall, as a minimum, include completion of the manufacturer's written requirements or recommendations for installation, operation and calibration of the device.

(9 VAC 5-50-40)

37. **Visible Emissions Evaluation;** Inspection for the presence of visible emissions from the waste paper handling system shall be conducted each time the system malfunctions and is vented outside of the building. If during the inspection, visible emissions are observed, timely corrective action shall be initiated within four hours of the inspection such that the waste paper handling system resumes operation and there are no visible emissions within 24 hours of the initial observation. If timely corrective action cannot be taken within the timeframe specified above, an EPA Method 9 (40 CFR Part 60, appendix A) visible emissions evaluation (VEE) shall be conducted on each source of visible emissions. Each VEE shall be conducted for a minimum period of six minutes.

(9 VAC 5-50-260)

38. **Performance Testing Notification;** The permittee shall furnish written notification to the Director, Piedmont Regional Office of the anticipated dates of performance tests of the printing facility and testing protocols postmarked at least 30 days prior to such dates.

(9 VAC 5-50-50)

RECORDS

39. **On Site Records;** The permittee shall maintain records of emission data and operating parameters as necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Director, Piedmont Region. These records shall include, but are not limited to
- a. Daily records demonstrating compliance with the requirements in Air Quality Program Policies and Procedures, Number AQP-4.
 - b. Monthly records demonstrating compliance with the requirements in 40 CFR 60.434 (NSPS, Subpart QQ).
 - c. Monthly records of the number of cylinders cleaned in the Renzmann cylinder cleaning tank, and the number of cylinders cleaned over the previous consecutive 12 month period.
 - d. Monthly material balance of VOC used at the facility over the previous 12 month period, to include:
 - i. Throughput of VOCs used at the Frankenthal press No. 745;
 - ii. Throughput of VOCs from the presses that is disposed of off site;
 - iii. Amount of VOC recovered by each of the carbon bed recovery systems;
 - iv. Calculation of emissions by solvent recovery system A and B, respectively
 - v. Total throughput of VOC used at presses No. 740, 741, 742, and 743, and throughput of VOC used at press No. 744;
 - vi. Total throughput of VOC used by the Renzmann cylinder cleaning tank; and
 - vii. Throughput of VOC used as a result of the paster gluing process.
 - e. Records for the total enclosure, the carbon bed adsorption systems and continuous emission monitoring systems, to include:
 - i. Manufacturer's recommendations for carbon bed replacement;
 - ii. Records of actual carbon bed replacement;
 - iii. Records to demonstrate completion of all monitoring equipment calibrations, checks and tests;
 - iv. Carbon bed inlet gas VOC concentrations, as applicable, and exhaust gas VOC concentrations;
 - v. Calculated 24 hour average VOC control efficiency (Press 745 only);
 - f. The monthly throughput of natural gas and the daily throughput of distillate oil, and all fuel supplier certifications.

- g. The number of hours of operation that the waste paper handling system is vented to outside of the building.
- h. Annual inspection records of the cyclones at the waste paper handling system.
- i. Maintenance schedules and records of completed maintenance.
- j. Operator training records.

These records shall be available for inspection by the DEQ and shall be current for the most recent five years.

(9 VAC 5-50-50)

40. **Semi-annual Reports;** The permittee shall submit fuel quality reports to the Director, Piedmont Regional Office within 30 days after the end of each semi-annual period. If no shipments of distillate oil were received during the semi-annual period, the semi-annual report shall consist of the dates included in the semi-annual period and a statement that no oil was received during the semi-annual period. If distillate oil was received during the semi-annual period the reports shall include:

- a. The dates included in the semi-annual period;
- b. A copy of all fuel supplier certifications for all shipments of distillate oil received during the semi-annual period or a semi-annual summary from each fuel supplier that includes the information specified in Condition 15 for each shipment of distillate oil; and
- c. A signed statement from the owner or operator of the facility that the fuel supplier certifications or summaries of fuel supplier certifications represent all of the distillate oil burned or received at the facility.

One copy of the semi-annual report shall be submitted to the U.S. Environmental Protection Agency at the address specified below:

Associate Director
Office of Air Enforcement (3AP10)
U.S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029

(9 VAC 5-170-160 and 9 VAC 5-50-50)

GENERAL CONDITIONS

41. Permit Invalidity; The portions of this permit to modify the rotogravure print facility shall become invalid, unless an extension is granted by the DEQ, if:

- a. A program of continuous construction is not commenced before the latest of the following:
 - i. 18 months from the date of this permit;
 - ii. Nine months from the date that the last permit or other authorization was issued from any other governmental agency;
 - iii. Nine months from the date of the last resolution of any litigation concerning any such permits or authorization; or
- b. A program of construction is discontinued for a period of 18 months or more, or is not completed within a reasonable time, except for a DEQ approved period between phases of a phased construction project.

(9 VAC 5-80-1210)

42. Right of Entry; The permittee shall allow authorized local, state, and federal representatives, upon the presentation of credentials:

- a. To enter upon the permittee's premises on which the facility is located or in which any records are required to be kept under the terms and conditions of this permit;
- b. To have access to and copy at reasonable times any records required to be kept under the terms and conditions of this permit or the State Air Pollution Control Board Regulations;
- c. To inspect at reasonable times any facility, equipment, or process subject to the terms and conditions of this permit or the State Air Pollution Control Board Regulations; and
- d. To sample or test at reasonable times.

For purposes of this condition, the time for inspection shall be deemed reasonable during regular business hours or whenever the facility is in operation. Nothing contained herein shall make an inspection time unreasonable during an emergency.

(9 VAC 5-170-130)

- 43. Notification for Control Equipment Maintenance;** The permittee shall furnish notification to the Director, Piedmont Region of the intention to shut down or bypass, or both, air pollution control equipment for necessary scheduled maintenance, which results in excess emissions for more than one hour, at least 24 hours prior to the shutdown. The notification shall include, but is not limited to, the following information:
- a. Identification of the air pollution control equipment to be taken out of service, as well as its location, and registration number;
 - b. The expected length of time that the air pollution control equipment will be out of service;
 - c. The nature and quantity of emissions of air pollutants likely to occur during the shutdown period;
 - d. Measures that will be taken to minimize the length of the shutdown or to negate the effect of the outage.

(9 VAC 5-20-180 B)

- 44. Notification for Facility or Control Equipment Malfunction;** The permittee shall furnish notification to the Director, Piedmont Region of malfunctions of the affected facility or related air pollution control equipment that may cause excess emissions for more than one hour, by facsimile transmission, telephone or telegraph. Such notification shall be made as soon as practicable but no later than four daytime business hours after the malfunction is discovered. The permittee shall provide a written statement giving all pertinent facts, including the estimated duration of the breakdown, within two weeks of discovery of the malfunction. When the condition causing the failure or malfunction has been corrected and the equipment is again in operation, the permittee shall notify Director, Piedmont Region in writing.

(9 VAC 5-20-180 C)

- 45. Violation of Ambient Air Quality Standard;** The permittee shall, upon request of the DEQ, reduce the level of operation or shut down a facility, as necessary to avoid violating any primary ambient air quality standard and shall not return to normal operation until such time as the ambient air quality standard will not be violated.

(9 VAC 5-20-180 I)

- 46. Maintenance/Operating Procedures;** The permittee shall take the following measures in order to minimize the duration and frequency of excess emissions, with

respect to air pollution control equipment , monitoring devices, and process equipment which affect such emissions:

- a. Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance.
- b. Maintain an inventory of spare parts.
- c. Have available written operating procedures for equipment. These procedures shall be based on the manufacturer's recommendations, at a minimum.
- d. Train operators in the proper operation of all such equipment and familiarize the operators with the written operating procedures. The permittee shall maintain records of the training provided including the names of trainees, the date of training and the nature of the training.

Records of maintenance and training shall be maintained on site for a period of five years and shall be made available to DEQ personnel upon request.
(9 VAC 5-50-20 E)

47. Permit Suspension/Revocation; This permit may be suspended or revoked if the permittee:

- a. Knowingly makes material misstatements in the application for this permit or any amendments to it;
- b. Fails to comply with the conditions of this permit;
- c. Fails to comply with any emission standards applicable to the equipment listed in Condition 1;
- d. Causes emissions from this facility which result in violations of, or interferes with the attainment and maintenance of, any ambient air quality standard;
- e. Fails to operate this facility in conformance with any applicable control strategy, including any emission standards or emission limitations, in the State Implementation Plan in effect on the date that the application for this permit is submitted;
- f. Fails to construct or operate this facility in accordance with the application for this permit or any amendments to it; or
- g. Allows the permit to become invalid.

(9 VAC 5-80-1210 F and G)

48. **Change of Ownership;** In the case of a transfer of ownership of a stationary source, the new owner shall abide by any current permit issued to the previous owner. The new owner shall notify the Director, Piedmont Region of the change of ownership within 30 days of the transfer.

(9 VAC 5-80-1240 B)

49. **Registration/Update;** Annual requirements to fulfill legal obligations to maintain current stationary source emissions data will necessitate a prompt response by the permittee to requests by the DEQ or the Board for information to include, as appropriate: process and production data; changes in control equipment; and operating schedules. Such requests for information from the DEQ will either be in writing or by personal contact. The availability of information submitted to the DEQ or the Board will be governed by applicable provisions of the Freedom of Information Act, §§ 2.1-340 through 2.1-348 of the Code of Virginia, § 10.1-1314 (addressing information provided to the Board) of the Code of Virginia, and 9 VAC 5-170-60 of the State Air Pollution Control Board Regulations. Information provided to federal officials is subject to appropriate federal law and regulations governing confidentiality of such information.

(9 VAC 5-170-60 and 9 VAC 5-20-160)

50. **Permit Copy;** The permittee shall keep a copy of this permit on the premises of the facility to which it applies.

(9 VAC 5-170-160)

AMENDMENT TO MAY 23, 2003 PERMIT

51. Condition 19 of this permit provides a list of the toxic pollutants to be emitted by the plant. A change in the amounts of these pollutants emitted and/or a change in your facility which results in additional toxic pollutants to be emitted may require a permit to modify and operate.

(9 VAC 5-80-1200)

52. The exhaust stack heights for all carbon bed adsorber systems located at the printing facility shall be a minimum of 50 feet, as measured from ground level. There shall be no caps or downturns installed at the exit of any carbon bed adsorber exhaust stack.

(9 VAC 5-80-1180)